

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

2018 DEC 20 AM 9:55

DEPUTY CLERK 

UNITED STATES OF AMERICA

v.

NO. 5:18-CR-00120-C

ISAIAH ALEXANDER ALLEN

FACTUAL RESUME

In support of Isaiah Alexander Allen's plea of guilty to the offense in Count One of the Indictment, Allen, the defendant, David Sloan, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the Indictment, charging a violation of 18 U.S.C. § 2261A(2), that is, Cyber Stalking, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant used an electronic communication service or any other facility of interstate or foreign commerce as charged in the Indictment;
- Second.* To engage in a course of conduct;
- Third.* With the intent to injure, harass, or intimidate B.K., the victim referenced in the Indictment; and
- Fourth.* The Defendant's course of conduct caused, attempted to cause, or would be reasonably calculated to cause substantial emotional distress to B.K.

¹ *United States v. William Davis*, 2017 WL6387429 (E.D.N.C. December 5, 2017)

STIPULATED FACTS

1. Isaiah Alexander Allen (“defendant”) admits and agrees that from in or about September 2017, through on or about November 14, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, he, defendant, with the intent to injure, harass, or intimidate B.K., a person in another state, namely, California, used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, or facility of interstate or foreign commerce, that is, the Internet, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause, substantial emotional distress to B.K., or placed B.K. in reasonable fear of death or serious bodily injury. In violation of 18 U.S.C. § 2261A(2).

2. Defendant is a 22-year-old male who has consistently resided in Lubbock, Texas, since September 2017. B.K. is a college-aged student who currently attends university in California and has resided consistently in California since September 2017.

3. Defendant and B.K. began an online dating relationship after meeting on the online game website, “League of Legends.” The two have never met in person but have communicated online and via skype, text message, and phone.

4. Over the course of their online dating relationship, B.K. sent Defendant numerous nude photographs of herself. These photographs were sent voluntarily and with B.K.’s consent.

5. On or about October 3, 2017, B.K. received a message from a friend notifying her that nude photographs of B.K. were posted on popular websites such as

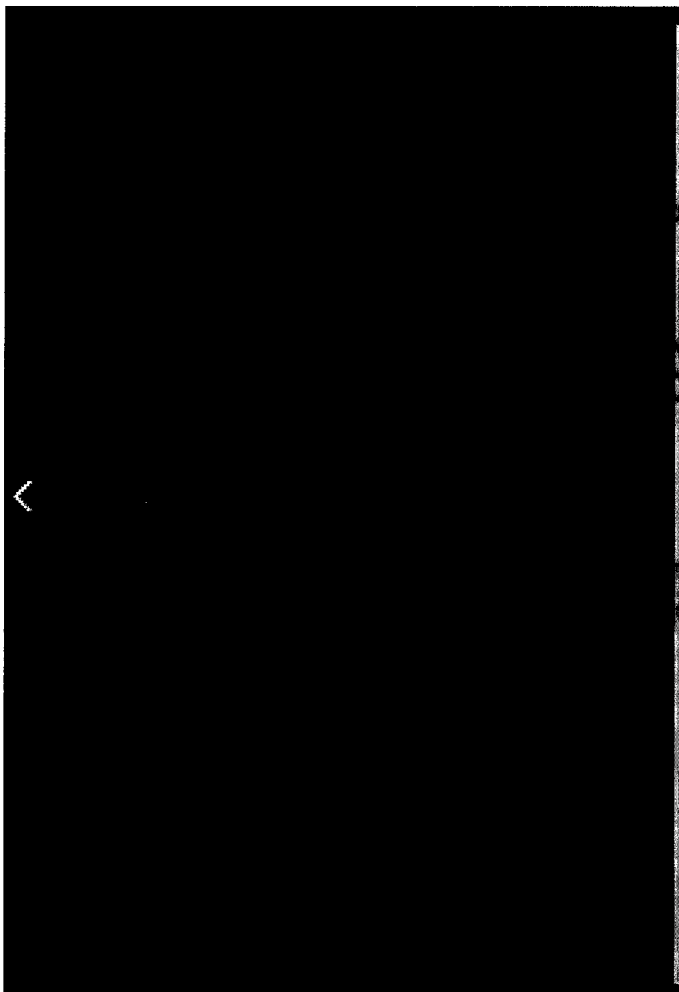
www.reddit.com and www.imgur.com. The friend sent B.K. a link to the reddit thread. That posting contained 74 photographs of B.K., including numerous photographs where her breasts, buttocks, and other parts of her body were exposed. In the album were numerous photographs showing her face. Defendant admits that he posted these photographs of B.K. willfully and with the intent to harass and intimidate B.K.

6. In addition to the nude photographs Defendant posted on www.reddit.com and www.imgur.com, he also posted a screen shot of her social security card, driver's license, and college/student ID card, along with nude images of B.K. in a collage display that Defendant created. Defendant further posted B.K.'s telephone number and her physical address.

7. Between October 2017 until at least December 2017, defendant continued to post nude images of B.K. on various online websites and forums, despite continued dialogue with B.K. and assurances that defendant was helping remove the images from the website.

8. To date, nude images of B.K. have been viewed over 1,000,000 times. Her nude images have also been shared on countless websites across the world, including "reddit.com," "imgur.com," "portfactory.info," "pornstartube," "xhamster," "redwap.me," "datr.com," "4chan" and "xpornplease."

9. Defendant intended for B.K.'s images to be shared and viewed by as many people as possible. Defendant bragged to an online friend that he couldn't help it if someone were to... "reupload from scratch."

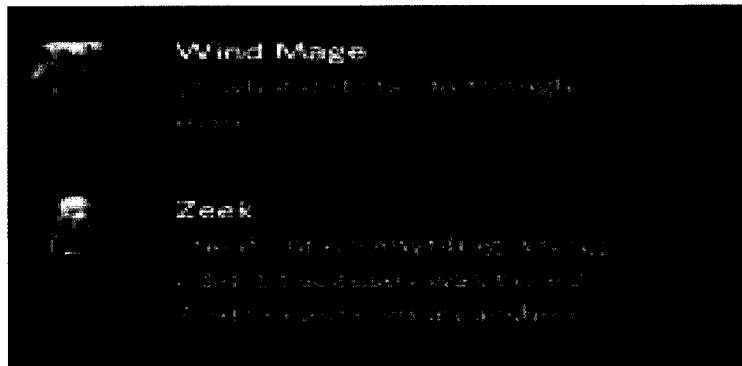


11. Between October 2017 through at least December 2017, Defendant made various threats to B.K., including but not limited to, the following:

I wanted to kill you in person
[REDACTED] today at 2:10 PM
Text
So I could rape you first then let you
bleed to death

I wanted to read headline
ucla girl jumps from building

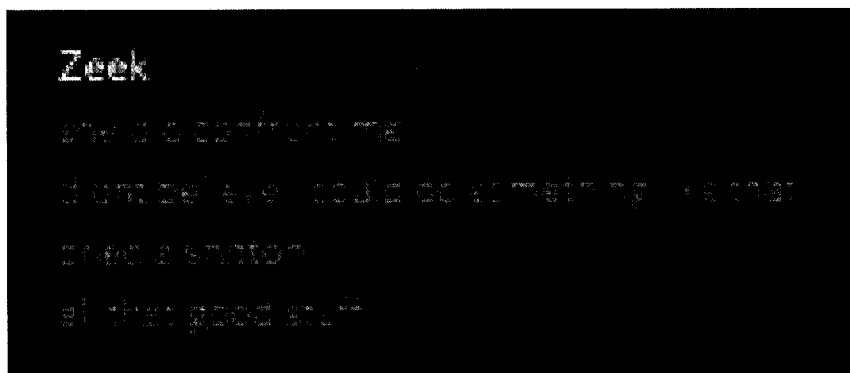
12. Defendant would communicate with friends about his illegal conduct using the online platform, Discord. Defendant would communicate on Discord using various aliases or usernames, including the name "Zeek." The below images are all screenshots of various Discord conversation between Defendant and another Discord user.



Zeek

well she's not like other girls
she doesnt drink do drugs go to parties or anyt of that stuff
really prudish
and she's also still a virgin, she never fucked her and thats probably one of the reasons he left her
she trusted me as the one other person to see her naked
So it went from being 2 people
to 100k+
and she's really upset about that

13. Defendant laughed when B.K. confronted him:



14. When B.K. called off the online relationship and “blocked” him, Defendant continued to follow her on secret accounts.

Zeek

oh yeah thats totally done

she said ill never see her face again

blocked me on twitter/fb/insta etc

but still

better than nothin

dont worry i already have a 2nd account that follows both her accounts that she doesnt know of



15. Defendant stated that he enjoyed knowing that B.K. was suffering:

Zeek

These are all plans i have down

for now she's just my bitch

she's had enough for now

she started cutting classes because she was scared someone knew her irl
cuts classes as much as she cuts her arms now XD

i think thats enough for now

until i get bored again

anyways its an interesting feeling to have someone at your mercy
a bit of a rush

Zeek

she's lives paranoid everyday

if any of her relatives type in her name

its over for her

if she pisses ZeeX off

its over for her

+ the stress of college and her annoying ass roomates

she's really strong though

i think your would have broke a long time ago
hard to crack

Zeek

XD

she was

soooooo paranoid

and was begging me not to tell her mom

it was pretty entertaining

to see someone beg for their life

tbh

16. Defendant talked about how he wanted to “keep her alive” so she could live in fear:

Zeek

hahah

maybe that was a little ridiculous

but it was a little

it was pretty, kind of like

and then

I got tired of it

and then I was like, “I’m gonna keep her alive”

I was like, “I’m gonna keep her alive” and then I was like, “I’m gonna keep her alive”

she was like, “I’m gonna keep her alive”

much more interesting to keep her alive

and have her terrified every day

and then I was like, “I’m gonna keep her alive”

and then I was like, “I’m gonna keep her alive”

17. Defendant knew posting images of B.K. would have long-lasting effects on her.

Zeek

because at that point I would have literally taken everything away from her

her family her future her reputation her and all remaining self-worth she had

18. Defendant sent B.K.'s nude images to B.K.'s mother to harass, intimidate, and terrorize B.K.

Zeek
I did it
She lost so much blood she passed out and woke up in a hospita
so i a most did it

Wind Mage
what did you do

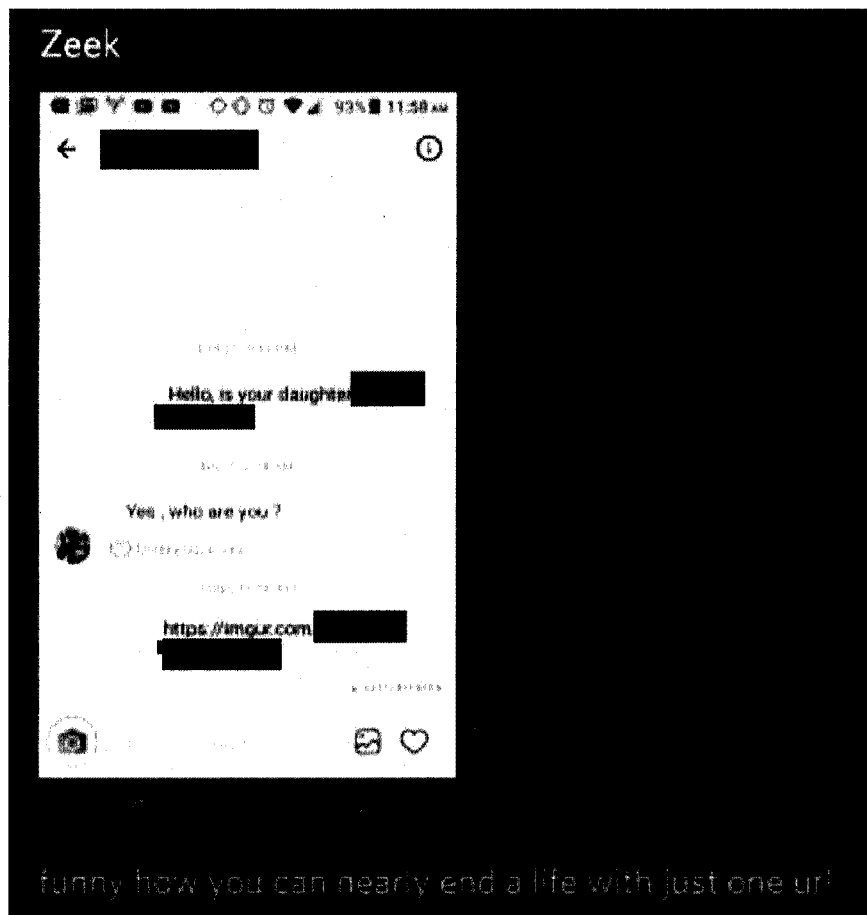
Zeek
Sent her a nude message

Wind Mage
does she know it was you

Zeek
it doesnt matter
her mom just disowned her
Told her she never wants to see her again
blocked all her contacts
cut off her credit/debit cards
cussed her out then left her

Zeek
after i saw i had a lot of time and i had a lot of time like i was a girl that she never saw before
the next day she did it
the next day she did it

19. Defendant found it “funny” how you could nearly end a life with one url:.



20. Defendant bragged on an online forum how he intentionally and willfully took steps to physiologically and mentally hurt B.K. He further bragged that because she didn't send him "the pictures [he] want[ed]," he chose to leak the nude images of B.K.

Nearly killed my best friend 3 weeks ago. Here's the story

- > Sweet girl turned into an annoying bitch
- > Only use for her anymore is her body
- > We had a flirty relationship before, so I have nudes of her.
- > Decide to blackmail her for more nudes or else I leak her current ones on reddit
- > Scare her shitless, obtain more nudes, crushing our friendship
- > She still doesn't give me the pictures I want
- > decide to leak her nudes
- > They amass tons of views, some of her friends find them
- > Life already starting to crumble
- > Decide to blackmail her further, show her parents the leaked nudes

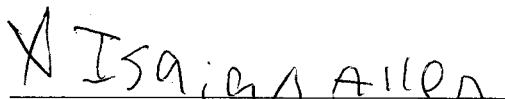
- > Her parents are muslim, would disown her they ever find out
- > Contemplate truly destroying her life
- > Message her mother on Insta, she doesn't respond
- > One week later she responds. I instantly show her the nudes and inform her how much of a slut her daughter is
- > "why did you do this to me"
- > Parents and family cease all contact with her
- > Blocked by own parents
- > Debit Cards canceled
- > She has to drop out of college because she cannot afford it anymore
- > Finally she decides to attempt to end her own life.
- > Grabs blades and cuts deep.
- > Begs me to call an ambulance
- > I don't
- > Demands I call an ambulance for her
- > I still don't.
- > She eventually calls one for herself and is taken away to hospital
- > Fast Forward a week
- > She doesn't have money for this month's rent, and she has no family to go home to. Has to drop out of college and give up on her dreams
- > Ruined her life.
- > Fuck you [REDACTED]


21. Defendant agrees that his course of conduct was intended to, and in fact did cause, substantial emotional distress to B.K.

22. The defendant agrees that the defendant committed all the essential elements of the offense(s). This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the Indictment.

AGREED TO AND STIPULATED on this 19 day of December, 2018.

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ISAIAH ALEXANDER ALLEN
Defendant


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